IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: DEALER MANAGEMENT SYSTEMS ANTITRUST LITIGATION

This Document Relates To:

THE DEALERSHIP CLASS ACTION

MDL No. 2817 Case No. 18-cv-00864

Hon. Robert M. Dow, Jr.

Magistrate Judge Jeffery T. Gilbert

DEALERSHIP CLASS PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL

Dealership Class Plaintiffs respectfully request leave to file MDL Plaintiffs' Motion to Compel Disclosure of CDK's Clawback Documents, Declaration of Peggy J. Wedgworth, and exhibits, under seal. The Motion to Compel Disclosure of CDK's Clawback Documents, the Declaration of Peggy J. Wedgworth, and the exhibits thereto contain information that has been designated as "HIGHLY CONFIDENTIAL" or "CONFIDENTIAL" under the Agreed Protective Order (Dkt. No. 104). In addition, pursuant to Paragraph 13(c) of the Agreed Protective Order, the moving party must seek to file this motion under seal. Dealership Class Plaintiffs will file a public, redacted version of the Dealership Class Plaintiffs' Motion to Compel Disclosure of CDK's Clawback Documents, Declaration of Peggy J. Wedgworth, and the exhibits thereto.

Dated: July 30, 2018 Respectfully Submitted,

/s/ Peggy J. Wedgworth

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CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on July 30, 2018, I caused a true and correct copy of the foregoing **DEALERSHIP CLASS PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL**, to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

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